

DTE/RFO
CORRESPONDENCE
INCOMING LETTER

92DOE 116509

ACTION
ORGAN #

DUE DATE 11/11/92

	LTR	ENC
VAETH, TA		
PAUOLE, AH		
BISHOP, ML		
BRAINARD, B		
HARTMAN, J	X	
IZELL, K		
KAROL, MS		
McBRIDE, MH		
SARGENT, D		
SIMONSON, DP		
WITHERILL, VF		
ADAMS, JJ		
ANDERSON, TW		
CRAUN, RL		
DUFFY, GG		
EVERNIER, RJ		
LOCKHART, FR	X	
LUKOW, TE		
OLINGER, S		
RASK, WC		
RUSCITTO, DG		
SCHASSBURGER	X	
STREHEL, T		
HARGREAVES, M		
HUFFMAN, GN		
WALCHESKI, D		
McCORMICK, MS		
WILLER, HG		
WELSON, G		
WISHIMOTO, GI		
OSTMEYER, RM		
WETSCH, E		
OSLUSZNY, J		
RAMPE, J		
REECE, R		
STEWART, JD		
ANDERPUI, M		
VALLIN, B		
VIENAND, J		
WIP	X	
RECORDS	X	X

NOTE:

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BY: DATE:

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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DENVER, COLORADO 80202-2466

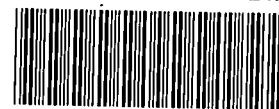
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REC'D MAIL ROOM

OCT 26 1992

OCT 28 A 7:41

Ref: 8HWM-FF

Mr. Frazer Lockhart
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928



000020097

Re: Clarification of Technical
Memorandum #8 Comments

Dear Mr. Lockhart

The purpose of this letter is to clarify a comment made in the October 5, 1992, EPA response to Technical Memorandum #8 (Operable Unit 1) concerning the toxicity screen used to eliminate contaminants from further consideration. Not all EPA staff were aware at that time, that the Agency had consented to this particular method for eliminating contaminants from further consideration in the risk assessment for Operable Unit (OU) 1. In light of this, the comment (page 1, paragraph 5) disagreeing with the method, is withdrawn.

My concerns still remain. Although the method is suggested in EPA's Risk Assessment Guidance for Superfund (RAGS), I feel there are problems with this method which potentially can (and did appear to) eliminate contaminants present in concentrations which could present an unacceptable health risk. I feel that a screening method which takes both toxicity and exposure into consideration would resolve these concerns and may be more appropriate. One such method is the use of screening level preliminary remediation goals as outlined in RAGS (Part B) and alluded to in my previous comments.

I understand the risk assessment for OU 1 will use the methodology presented in RAGS. I would recommend that any chemical or chemicals eliminated through this process, which are then found to be present in concentrations above acceptable health-based levels, be added back into the risk assessment, perhaps as a professional judgement criteria. In the future, I would be interested in revisiting this issue for the remaining OUs at Rocky Flats.

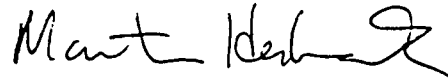
ADMIN RECORD

A-OU01-000684

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If you have any questions regarding this issue, please contact Gary Kleeman of my staff at (303) 293-1071, or Susan Griffin at (303) 294-7667.

Sincerely,

A handwritten signature in dark ink, appearing to read "Martin Hestmark". The signature is fluid and cursive, with a large, stylized "M" and "H".

Martin Hestmark, Manager
Rocky Flats Project

cc: Gary Kleeman, EPA
Scott Grace, DOE
Dennis Smith, EG&G
Joe Schieffelin, CDH.